

**CONCURRING STATEMENT OF
COMMISSIONER ROBERT M. McDOWELL**

*In the Matter of High-Cost Universal Service Support; Coalition for Equity in Switching Support
Petition for Clarification, WC Docket No. 05-337*

I have consistently stated that, while the Universal Service system has been instrumental in keeping Americans connected and has improved their quality of life, the system is in dire need of comprehensive reform. And, as a general principle, a Universal Service system should not reward companies for losing customers to competitors. On the other hand, in the context of our existing rules, I understand the hardship concerns expressed by the petitioners. I hope that the resulting record will lead us to a fuller understanding of the ramifications of the rural carriers' request. Finally, as a procedural matter, I do have some concerns that this order has included specific tentative conclusions without sufficient justification on the record. For these reasons, I concur with this Notice of Proposed Rulemaking.